

**Memorandum**

Date 23 April 1990

From Greg Thomas
ATSDR

Subject Draft Asbestos Removal Plan
Bunker Hill Site

To Sally Martyn
EPA Site Manager

Thank you for the opportunity to review the draft Asbestos Removal Plans submitted by Minerals Corp. of Idaho and Gulf Resources and Chemical Corp.. In general both plans fail to address one of the primary concerns of our Advisory, the need for a "specific site safety plan containing a detailed discussion of personal protective equipment necessary for work in and around asbestos."

Due to the potential health effects from asbestos any exposure is of concern. Since workers do access the buildings routinely they need to be properly protected. Our understanding after discussions with the EPA is that the asbestos removal done in the fall of 89 only encompassed that which was outside the buildings and there is still significant amounts of loose material inside buildings where workers would come in contact with it. Until an approved plan is in effect that outlines personal protective equipment required for employees inside buildings or all asbestos is removed we still consider this problem to be a significant risk to public health. Workers should not be in these areas unprotected.

Both plans fail to specify the locations and types of asbestos involved. Unless this information is provided we cannot evaluate the risks to people.

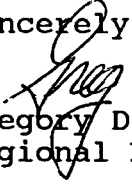
The determination of what constitutes an imminent and substantial health risk is not a decision for Minerals Corporation of Idaho or Gulf Resources to make. That decision rests with the Public Health Service in conjunction with EPA and the appropriate health departments. Since asbestos removal inside of buildings has not been addressed yet and the use of protective clothing/equipment while in those areas has not been approved the smelter complex still represents a threat to human health.

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04.05.05.05-1003

In effect neither document represents a detailed formulation of a program of action or a "plan".

Sincerely,


Gregory D. Thomas
Regional Representative